

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JANE DOE J.R.L.,

Plaintiff,

v.

HILTON DOMESTIC OPERATING
COMPANY INC.; HILTON DOMESTIC
MANAGEMENT LLC; and CROSSTOWN
CENTER HOTEL LLC d/b/a HAMPTON
INN & SUITES,

Defendants.

Civil Action No.: 1:24-cv-13227

PLAINTIFF'S MOTION TO PROCEED UNDER PSEUDONYM

The Plaintiff, by counsel, respectfully moves this Honorable Court for leave to proceed in this action under the pseudonym Jane Doe (J.R.L.) In support of this motion, Plaintiff states that this action involves highly personal private information as well as emotional, physical, and sexual abuse of a vulnerable individual. Plaintiff fears repercussions should her identity be disclosed to the public, magnifying the harm that she has already suffered. Plaintiff is a member of a vulnerable population and the risks to her are not outweighed by any countervailing considerations. Defendants are not prejudiced by Plaintiff proceeding in pseudonym.. Plaintiff further relies upon the memorandum of law submitted herewith.

For the reasons set forth herein and in the attached memorandum, Plaintiff respectfully requests that this honorable Court enter the attached Order. *See* [Proposed] Order, attach hereto as

Exhibit 1.¹

3/27/25 Allowed
w/ no opposition.
Defendant raised
several reasonable
imitations. The parties
shall confer as appropriate
Pamela Sues

¹ Should the Court not be inclined to grant this motion, for whatever reason, Plaintiff respectfully requests the opportunity to amend her complaint, with the amendment relating back to the date of original filing.